

1 RUSS, AUGUST & KABAT
2 Marc A. Fenster, State Bar No. 181067
3 mfenster@raklaw.com
4 Neil A. Rubin, State Bar No. 250761
5 nrubin@raklaw.com
6 James S. Tsuei (CA Bar No. 285530)
7 jtsuei@raklaw.com
8 12424 Wilshire Boulevard, 12th Floor
9 Los Angeles, California 90025
10 Telephone: (310) 826-7474
11 Facsimile: (310) 826-6991

12 Attorneys for Plaintiff
13 COREPHOTONICS, LTD.

14 COREPHOTONICS, LTD.

15 Plaintiff,

16 vs.

17 APPLE INC.

18 Defendant.

19 Case No. 3:17-cv-06457-JD (Lead)
20 Case No. 5:18-cv-02555-JD

21 **DECLARATION OF JAMES S. TSUEI IN
22 SUPPORT OF PLAINTIFF
23 COREPHOTONICS, LTD.'S
24 ADMINISTRATIVE MOTION TO FILE
25 UNDER SEAL**

RUSS, AUGUST & KABAT

1 I, James S. Tsuei, state as follows:

2 1. I am a member of the State Bar of California and an attorney at the firm of Russ,
3 August & Kabat, counsel for Plaintiff Corephotonics, Ltd. in the above captioned action. I have
4 personal knowledge of the facts set forth herein, and if called upon to testify, could and would
5 testify competently thereto.

6 2. I submit this declaration in support of Corephotonics' Administrative Motion to
7 File Under Seal (1) Portions of Corephotonics' Opposition to Apple's Motion to Amend Answer;
8 (2) Portions of Declaration of Brian D. Ledahl in Support of Corephotonics' Opposition; and (3)
9 entirety of Exhibit 1 to Declaration of Brian D. Ledahl in Support of Corephotonics' Opposition,
10 which contain information that Corephotonics considers to be "Highly Confidential" -- Attorneys'
11 Eyes Only" under the Protective Order Regarding the Disclosure and Use of Discovery Materials
12 in this case (Dkt. 77). Specifically, the information that Corephotonics seeks the Court's
13 permission to file under seal relates to information which Defendant Apple wishes to keep
14 confidential, including information about a contractual relationship between Apple and another
15 entity. Corephotonics understands Apple wishes to keep such information confidential for reasons
16 set forth in paragraph 4 of the Declaration of Lowell Mead, filed at Dkt. 191-1.

17 I declare under penalty of perjury under the laws of the United States the foregoing is true
18 and correct.

19
20
21 Executed on November 20, 2023 in Los Angeles, California.

22
23 By: /s/ James S. Tsuei
24 James S. Tsuei
25
26
27
28